

Industrial Emissions Directive (IED)

Environmental Inspection Plan 2015

With respect to offshore (petroleum) platforms engaged in oil and gas and gas unloading / storage activities (including CO₂), the IED has been implemented in the UK by The Offshore Combustion Installations (Pollution Prevention and Control) Regulations 2013. Definitions for petroleum platforms (including fixed and floating structures) are contained within the Regulations. The Regulations represent a permitting regime for controlling the atmospheric emissions of NO_x, SO_x, CO, methane and non-methane VOCs from combustion installations on petroleum platforms, where the aggregated thermal capacity of the combustion installations is $\geq 50\text{MW(th)}$.

A requirement of the Regulations is for the Department to have in place an Environmental Inspection Plan (the Plan) for offshore combustion installations.

Environmental Inspection Plan

1. Significant Environmental Issues

Operators are required to submit a Best Available Technique (BAT) assessment as part of their application for a combustion installation permit. This assessment must include details of the combustion equipment and the associated management regime in addition to details of energy efficiency studies. An environmental impact assessment must also be provided which focuses on atmospheric emissions and includes dispersion modelling studies which identify the local and regional environmental impacts.

The Department's Environmental Management Team review applications for combustion installation permits and in doing so assess the environmental impacts and issues associated with the combustion installation.

Any significant environmental issues are therefore considered during the permit application stage.

2. The Geographical Area Covered by the Plan

The geographical area covered by the Plan is the United Kingdom Continental Shelf (UKCS).

3. Register of Offshore Combustion Installations Covered by the Plan

The register of offshore combustion installations covered by the Plan is held by the Department's Environmental Management Team.

4. Programme for Routine Environmental Inspections

Offshore combustion installations are inspected as part of a wider regulatory compliance program and inspections under the Regulations will form part of this wider inspection program. This is to avoid a requirement for additional offshore inspections.

The requirements of the Regulations are that all relevant combustion installations are inspected on a routine basis, ranging from annually to three yearly based upon the environmental risk. The inspection of offshore platforms with eligible combustion installations will primarily be risk-ranked based on the annual aggregated mass of the permitted emissions limits, through other factors such as non-compliances against the Regulations and EMS verification status will be taken into account when considering the overall risk. Those with the highest risk will be inspected annual, typically as part of a routine offshore inspection. Those installations with lower risk shall continue to be inspected as part of the wider inspection program, which may result in more frequent inspections, but they shall be inspected a least three-yearly to meet the requirements of the Regulations.

If an inspection has identified an important case of non-compliance with the permit conditions a subsequent inspection shall be carried out within six months of that inspection.

Environmental inspections may consist of an offshore element, and onshore element or both.

5. Scope of Inspection

Inspections shall review the compliance of the operator with the Regulations and permit conditions. This shall include but may not be limited to, the monitoring of emissions; review of internal reports and verification of self-monitoring.

6. Procedure for Non-Routine Environmental Inspections

Non-routine environmental inspections will be conducted under the following circumstances and in accordance with the Department's Investigations Policy:

- Complaints received by the Secretary of State of serious environmental incidents;
- Serious environmental accidents or incidents; and
- Occurrences of serious non-compliances (inspection within six months where appropriate).

7. Coordination of Statutory Responsibilities with Other Organisations

With regard to offshore combustion installations, the Health and Safety Executive (HSE) also have a regulatory role where human health and safety may be at risk. In this respect a Memorandum of Understanding (MoU) exists between the Department and the HSE which clarifies the responsibilities of each organisation. The MoU can be found here:

http://www.hse.gov.uk/aboutus/howwework/framework/f-mou_f.pdf

Section 12 of this document identifies that the Department regulates:

“The control of quantities of noxious pollutants emitted from combustion equipment, and implementation of the Integrated Pollution Prevention and Control (IPPC) Directive for onshore oil and gas installations”.

8. Review of Environmental Inspection Programme

The environmental inspection programme shall be reviewed on an annual basis, taking account of the requirements of the Regulations whilst ensuring the Department’s inspection resources are targeted appropriately at those offshore platforms (with combustion installations $\geq 50\text{MW(th)}$) that pose the highest overall environmental risks.

9. Review of Environmental Inspection Plan

The Environmental Inspection Plan shall be reviewed on an annual basis.